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NAN, NEGOTIABLE INSTRUMENTS LAW, §§ 70, 80, 89, 115-3. A note indorsed before delivery by stockholders or directors of a corporation which receives the proceeds, is made, not for their accommodation, but for the accommodation of the corporation. *First National Bank v. Bickel*, *supra*; *McDonald v. Luckenbach*, 170 Fed. 434, 437. *Contra*, *Mercantile Bank v. Busby*, 120 Tenn. 652, 667, 113 S. W. 390, 394. And an accommodating indorser is discharged in the absence of demand and notice. *Mechanics' & Farmers' Savings Bank v. Katterjohn*, 137 Ky. 427, 125 S. W. 1071.

CARRIERS — INTERSTATE COMMERCE — CONNECTING LINES — LIABILITY OF INITIAL CARRIER FOR DELAY UNDER CARMACK AMENDMENT. — The plaintiff shipped strawberries by the defendant railroad to a point beyond the defendants' own lines. Through the negligence of a connecting carrier the shipment was delayed. The Carmack Amendment subjects the initial carrier to liability for "loss, damage, or injury to such property" caused by a connecting carrier. U. S. COMP. STAT. 1913, § 8592, cl. 11. *Held*, that the initial carrier is liable. *New York, etc. R. Co. v. Peninsula Produce Exchange*, Sup. Ct. Off., No. 137, Jan. 24, 1916.

The court declares the broad purpose of the Act to be to localize responsibility for "any failure to discharge a carrier's duty with respect to any part of the transportation to the agreed destination." It therefore holds that the words "loss" and "damage" mean loss or damage to the owner, not loss or damage to the property. For a discussion of this clause of the Carmack Amendment, see 29 HARV. L. REV. 217.

CONSTITUTIONAL LAW — DUE PROCESS OF LAW — RIGHT TO HEARING ON TAX ASSESSMENT. — The Colorado Tax Commission and the State Board of Equalization made a forty-per-cent increase in the valuation of all the taxable property in Denver. No opportunity for a hearing was given taxpayers aside from the fact that the time of meeting of the boards was fixed by law. The plaintiff seeks to enjoin the enforcement of this order on the ground that it violates the Fourteenth Amendment. *Held*, that the injunction will not issue. *Bi-Metallic Investment Co. v. State Board of Equalization*, 239 U. S. 441.

Where a person may be deprived of property, the right to be heard in quasi-judicial proceedings is fundamental to the idea of due process. *Petition of Ford*, 6 Lans. (N. Y.) 92; *Stuart v. Palmer*, 74 N. Y. 183. Consequently tax assessments where no opportunity for a hearing is given, are held void. *Albany City Nat. Bank v. Maher*, 9 Fed. 884; *Central, etc. Ry. Co. v. Wright*, 207 U. S. 127; *Scott v. City of Toledo*, 36 Fed. 385, 396. See 20 HARV. L. REV. 320. However, it has been held that a horizontal increase in the valuation of a certain large class of property, as in the principal case, does not necessitate notice and an opportunity for a hearing to the individuals of the class affected. *State Ry. Tax Cases*, 92 U. S. 575, 609. On the other hand, the failure to give such notice in the assessment of a paving tax on a considerable number of people, in each case on individual grounds, has been held to be a denial of due process. *Londoner v. Denver*, 210 U. S. 373. The result seems to be that if a large number of people are equally affected no direct notice is required, while the reverse is true if the group is small or its members are unequally affected.

CONSTITUTIONAL LAW — MAKING AND CHANGING CONSTITUTIONS — CONSTITUTIONAL CONVENTION — RESTRICTION BY LEGISLATURE. — A constitutional convention was called in Louisiana by popular vote adopting a proposal of the legislature. This proposal contained restrictions on the power of the convention to revise certain matters, but gave the convention power to enact